

Overarching Comments

FHWA REQUEST 1: *The FHWA considered these principles in this NPRM and encourages comments on the extent to which the approach to performance measures set forth in this NPRM supports the principles discussed above.*

1. **Provide for a National Focus** – focus the performance requirements on outcomes that can be reported at a national level.
2. **Minimize the Number of Measures** – identify only the most necessary measures that will be required for target establishment and progress reporting. Limit the number of measures to no more than two per area specified under 23 U.S.C. 150(c).
3. **Ensure for Consistency** – provide a sufficient level of consistency, nationally, in the establishment of measures, the process to set targets and report expectations, and the approach to assess progress so that transportation performance can be presented in a credible manner at a national level.
4. **Phase in Requirements** – allow for sufficient time to comply with new requirements and consider approaches to phase in new approaches to measuring, target establishment, and reporting performance.
5. **Increase Accountability and Transparency** – consider an approach that will provide the public and decision makers a better understanding of Federal transportation investment needs and return on investments.
6. **Consider Risk** – recognize that risks in the target establishment process are inherent, and that performance can be impacted by many factors outside the control of the entity required to establish the targets.
7. **Understand that Priorities Differ** – recognize that State DOTs and MPOs must establish targets across a wide range of performance areas, and that they will need to make performance trade-offs to establish priorities, which can be influenced by local and regional needs.
8. **Recognize Fiscal Constraints** – provide for an approach that encourages the optimal investment of Federal funds to maximize performance but recognize that, when operating with scarce resources, performance cannot always be improved.
9. **Provide for Flexibility** – recognize that the MAP-21 requirements are the first steps that will transform the Federal-aid highway program to a performance-based program and that State DOTs, MPOs, and other stakeholders will be learning a great deal as implementation occurs.

FHWA REQUEST 2: *The DOT requests comments on how the Department could address separate nonmotorized performance measures. The DOT requests input on the extent to which States and MPOs currently collect and report non-motorized data (fatality, serious injury, miles traveled) and the reliability and accuracy of such data, and how States and MPOs consider such data in their safety programs and in selecting investments. The DOT also invites the public to suggest ways to most efficiently track, report, and use performance measures to improve safety.*

Definitions

- 5-year Rolling Average

FHWA REQUEST 3: Stakeholders are encouraged to comment on whether a 3-, 4- or 5-year rolling average should be required for the HSIP performance measures. Stakeholders are also encouraged to comment on whether the use of moving averages is appropriate to predict future metrics.

- Rate
- Historical Trend Line
- Made Significant Progress
- Serious Injury definition
 - Initial definition uses KABCO scale and conversion tables developed by NHTSA.
 - Within 18 months of effective date of the rule, the definition is “suspected serious injury (A) as defined in the MMUCC, latest edition.

FHWA REQUEST 4: The FHWA solicits comment on whether some other injury classification and coding system would be more appropriate.

Calculation of Performance Measures

- Number of Fatalities
- Rate of Fatalities
- Number of Serious Injuries
- Rate of Serious Injuries

Performance Targets

- Process of establishing performance targets

FHWA REQUEST 5: The current time lag (time period between the end of the calendar year in which the data were collected to the date the data is available in the national system for the final FARS and HPMS data) is approximately 24 months. The DOT seeks comments on whether this time lag is an issue, any impacts it may have on a State DOT’s ability to establish targets, and any suggestions that can help address this issue.

- The number of performance targets that may be established by State DOTs
 - State DOTs must establish statewide target
 - State DOTs may establish one target for all urbanized areas
 - State DOTs may establish one targets for all non-urbanized areas
- The process that MPOs must use to establish performance targets
- Coordination of performance target setting between MPOs and State DOTs

FHWA REQUEST 6: Many differences in target setting boundaries could exist that would require State DOTs and MPOs to coordinate on quantifiable targets between them using the proposed target

setting requirements in this section. As part of the coordination process, State DOTs and MPOs are encouraged to consider how the data will be reported. The FHWA is seeking comment on alternative approaches that could be considered to effectively implement the coordination requirements of MAP-21 (e.g., 23 U.S.C. 134(h)(2)(B)(i)(I) and 23 U.S.C. 150(d)(2) considering the need for coordination required under 23 U.S.C. 134(h)(2)(B)(i)(II) and 23 U.S.C. 135(d)(2)(B)(i)(II).)

Determining Significant Progress Being Made Towards Performance Targets

- Source of data that goes into the determination
- Evaluation methodology

FHWA REQUEST 7: *Stakeholders are encouraged to comment on the appropriateness of the trend line methodology proposed for the significant progress analysis.*

FHWA REQUEST 8: *The FHWA seeks comment on whether the underlying methodology of the prediction interval is appropriate.*

FHWA REQUEST 9: *The FHWA seeks comment on whether 50 percent is the appropriate threshold for determining if a State has overall achieved or made significant progress toward achieving its performance targets.*

- When the evaluation occurs

Reporting

- Reporting of State DOT targets
- Reporting of MPO targets
 - To the State DOTs
 - Through the System Performance Report in the Metropolitan Transportation Plan